UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO: 04 10685 WGY

MELINDA BROWN and)
TREFFLE LAFLECHE,)
)
Plaintiffs)
)
VS.)
)
AMERICAN INTERNATIONAL GROUP,)
INC. and NATIONAL UNION FIRE)
INSURANCE COMPANY OF)
PITTSBURGH, PENNSYLVANIA,)
Defendants)

RULE 7.1 (A) (2) CERTIFICATION

I, John G. Ryan, certify that Michael Keohane, an Associate in my office, discussed the DEFENDANTS' MOTION TO FILE A REPLY TO PLAINTIFF'S REPLY BRIEF with Attorney B. Michael Ortwein, III, counsel for the Plaintiffs, and attempted in good faith to resolve or narrow the issue. As a result, Plaintiffs' counsel agreed that he had no opposition to the filing of that Motion.

June 18, 2004

/s/ John G. Ryan John G. Ryan, BBO #435560 22 Batterymarch St., 4th Floor Boston, MA 02109 617-348-9200